

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Filed: _____

INDEX NO. _____

FREDDY SALAS,
Plaintiff,

Plaintiff designates Bronx
County as the place of trial.

-against-

S U M M O N S

TRACY KING and RYDER TRUCK RENTAL INC.,
Defendants.

The basis of venue is
Plaintiff's residence:
984 Simpson Street Apt. B2
Bronx, New York

To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service of this summons, or within 30 days after service of this summons is complete if this summons is not personally delivered to you within the State of New York.

In case of your failure to answer this summons, a judgment by default will be taken against you for the relief demanded in the complaint, together with the costs of this action.

Dated: Forest Hills, New York
November 12, 2021

KRUPNIK LAW GROUP, P.C.


By: Alla Krupnik, Esq.
Attorneys for Plaintiff
108-18 Queens Blvd., Suite 704
Forest Hills, New York 11375
(718) 532-4400

TO: RYDER TRUCK RENTAL INC.
119 Moonachie Avenue
Moonachie, New Jersey 07074

TRACY KING
53 Frederick Terrace
Irvington, New Jersey 07111

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

FREDDY SALAS,

Plaintiff,

-against-

TRACY KING and RYDER TRUCK RENTAL INC.,
Defendants.

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VERIFIED COMPLAINT

Plaintiff, by his attorneys, KRUPNIK LAW GROUP, P.C., as and for his Verified Complaint, respectfully alleges, upon information and belief:

1. The plaintiff, FREDDY SALAS, at all times herein mentioned was and still is a resident of the County of Bronx and the State of New York.
2. The defendant RYDER TRUCK RENTAL INC., at all times herein mentioned, was and still is a corporation organized and existing under the laws of the State of New Jersey
3. The defendant RYDER TRUCK RENTAL INC., at all times herein mentioned was and still is a foreign corporation duly licensed and authorized to do business in the State of New York.
4. The defendant, RYDER TRUCK RENTAL INC., at all times herein mentioned conducted and carried on business in the County of Bronx and the State of New York.
5. The defendant, RYDER TRUCK RENTAL INC., at all times herein mentioned was and still is a partnership doing business in the County of Bronx and the State of New York.
6. The defendant, RYDER TRUCK RENTAL INC., at all times herein mentioned was and still is a limited liability partnership doing business in the County of Bronx and the State of New York.
7. The defendant, RYDER TRUCK RENTAL INC., at all times herein mentioned was and still is a limited liability corporation doing business in the County of Bronx and the State of New York.
8. The defendant, RYDER TRUCK RENTAL INC., at all times herein mentioned was

and still is a sole proprietorship doing business in the County of Bronx and the State of New York.

9. At all times herein mentioned, defendant RYDER TRUCK RENTAL INC. transacted business within the State of New York.

10. At all times herein mentioned, defendant RYDER TRUCK RENTAL INC. derived substantial revenue from goods used or consumed or services rendered in the State of New York.

11. At all times herein mentioned, defendant RYDER TRUCK RENTAL INC. expected or should reasonably have expected its acts to have consequences in the State of New York.

12. At all times herein mentioned, defendant RYDER TRUCK RENTAL INC. derived substantial revenue from interstate or international commerce.

13. On or about April 26, 2021, plaintiff FREDDY SALAS was the operator of a certain motor vehicle, bearing Virginia license plate number UFS9738.

14. On or about April 26, 2021, defendant RYDER TRUCK RENTAL INC. was the registered owner of a certain motor vehicle, bearing New Jersey license plate number XKAW63.

15. On or about April 26, 2021, defendant RYDER TRUCK RENTAL INC. was the titled owner of a certain motor vehicle, bearing New Jersey license plate number XKAW63.

16. On or about April 26, 2021, defendant RYDER TRUCK RENTAL INC. was the lessee of a certain motor vehicle, bearing New Jersey license plate number XKAW63.

17. On or about April 26, 2021, defendant RYDER TRUCK RENTAL INC. was the lessor of a certain motor vehicle, bearing New Jersey license plate number XKAW63.

18. On or about April 26, 2021, defendant RYDER TRUCK RENTAL INC. maintained a certain motor vehicle, bearing New Jersey license plate number XKAW63.

19. On or about April 26, 2021, defendant RYDER TRUCK RENTAL INC. controlled a certain motor vehicle, bearing New Jersey license plate number XKAW63.

20. On or about April 26, 2021, defendant TRACY KING was the operator of a certain

motor vehicle, bearing New Jersey license plate number XKAW63.

21. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING with the express knowledge business of its owner.

23. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING with the implied knowledge of its owner.

24. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING with the express consent of its owner.

25. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING with the implied consent of its owner.

26. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING with the express permission business of its owner.

27. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING with the implied permission business of its owner.

28. On or about April 26, 2021, the motor vehicle bearing New Jersey license plate number XKAW63 was being operated by defendant TRACY KING under the scope of employment and/or on the business of its owner.

29. On or about April 26, 2021, the roadway of Bruckner Blvd at or near its intersection with Longwood Avenue, County of Bronx, City and State of New York was a public roadway, street and/or thoroughfare.

30. On or about April 26, 2021, the vehicle operated by the defendant TRACY KING came in contact with the vehicle operated by the plaintiff FREDDY SALAS, at the aforementioned location.

31. Solely as a result of the defendants' negligence, carelessness and recklessness the plaintiff was caused to suffer severe and serious personal injuries to mind and body, and further, that the plaintiff was subjected to great physical pain and mental anguish.

32. The aforesaid occurrence was caused by the negligence of the defendants, without any culpable conduct on the part of the plaintiff.

33. As a result of the foregoing, the plaintiff sustained serious personal injuries as defined in Section 5102(d) of the Insurance Law of the State of New York, and/or economic loss greater than basic economic loss as defined in Section 5102(a) of the Insurance Law of the State of New York.

34. This action falls within one or more of the exceptions set forth in Section 1602 of the Civil Practice Law and Rules.

35. Due to defendants' negligence, plaintiff is entitled to damages in a monetary sum which exceeds the jurisdictional limit of all lower Courts which would otherwise have jurisdiction.

WHEREFORE, the plaintiff demands judgment awarding damages in a monetary sum which exceeds the jurisdictional limit of all lower Courts which would otherwise have jurisdiction, together with interest and the costs and disbursements of this action, and such other and further relief as to this Court seems just and proper.

Dated: Forest Hills, New York
November 12, 2021


By: Alla Krupnik, Esq.
KRUPNIK LAW GROUP, P.C.

Attorneys for Plaintiff
108-18 Queens Blvd., Suite 704
Forest Hills, New York 11375
(718) 532-4400

SUPREME COURT OF THE STATE OF NEW YORK
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FREDDY SALAS,

Plaintiff,

-against-

TRACY KING and RYDER TRUCK RENTAL INC.,
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**ATTORNEY'S
VERIFICATION**

Alla Krupnik, an attorney duly admitted to practice law in the State of New York, makes the following affirmation under the penalty of perjury:

I am of the firm of KRUPNIK LAW GROUP, P.C., the attorneys of record for the plaintiff.

I have read the foregoing Complaint and know the contents thereof; the same is true to my own knowledge except as to the matters therein stated to be alleged on information and belief and that as to those matters, I believe them to be true.

This verification is made by affirmant and not by plaintiff because he is not in the County of Queens, which is the County where your affirmant maintains offices.

The grounds of affirmant's belief as to all matters not stated upon affirmant's knowledge are correspondence had with the said plaintiff, information contained in the said plaintiff's file, which is in affirmant's possession, and other pertinent data relating thereto.

Dated: Forest Hills, New York
November 12, 2021



ALLA KRUPNIK

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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Plaintiff,

-against-

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Defendants.

SUMMONS and VERIFIED COMPLAINT

KRUPNIK LAW GROUP, P.C.

Attorneys for Plaintiff

Office and Post Office Address and Telephone

108-18 Queens Blvd., Suite 704

Forest Hills, New York 11375

(718) 532-4400

Service of a copy of the within SUMMONS and VERIFIED COMPLAINT is hereby admitted.

Dated, _____

.....

Attorney(s) for

Please take notice

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of _____

duly entered in the office of the clerk of the within named court on

☐ NOTICE OF SETTLEMENT

that _____, of which the within is a true copy will be presented for settlement to the HON. _____, one of the judges of the

within named court, at 851 Grand Concourse, Bronx, New York on _____

Dated: Forest Hills, New York

November 12, 2021

Yours, etc.,

KRUPNIK LAW GROUP, P.C.

Attorneys for Plaintiff